

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON  
HAMMONDS, BRENDA F. WATKINS,  
LIMESTONE UNIVERSITY, MG  
FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK  
S.A.R.L., MINDGEEK USA, INC., MG  
BILLING LTD., and HAMMY MEDIA LTD.  
d/b/a XHAMSTER.COM, TRAFFICSTARS  
LTD., WISEBITS LTD, XHAMSTER IP  
HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**WISEBITS IP, LTD.'S MOTION TO  
DISMISS PURSUANT TO FRCP 12(b)(2)  
and 12(b)(6)**

Pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6), Defendant Wisebits IP, Ltd. (“WIP”) respectfully moves for the Court to dismiss Plaintiffs’ Fifth Amended Complaint (“FAC”) as it applies to WIP because: (a) the Court lacks personal jurisdiction over WIP, a foreign company incorporated in Cyprus with a principal place of business in Limassol, Cyprus; and (b) the FAC fails to state a claim upon which relief may be granted.

In support of this Motion, WIP relies on the accompanying Memorandum of Law.

Respectfully Submitted,

/s/ Hannah Rogers Metcalfe

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Greenville, South Carolina